



James B. Wright
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January 3, 2002

EXECUTED

(FILE BY FAX, HARD COPIES TO FOLLOW BY MAIL)

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: Docket No. 97-00409: All Telephone Companies Tariff Filings
Regarding Reclassification of Pay Telephone Service.
UTSE Motion for Extension of Time

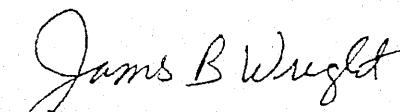
Dear Mr. Waddell:

Enclosed are an original and thirteen copies of United Telephone-Southeast, Inc. ("United") Motion for Extension of Time to January 11, 2002 to file a Response to the Motion to Compel filed by the Tennessee Payphone Owners Association ("TPOA").

United has contacted the attorney for the TPOA in this case and he had no objection to United's Motion.

Please contact me if you have any questions.

Sincerely,


James B. Wright

cc: Henry Walker (with enclosure)
Whitney Malone
Laura Sykora
Kaye Odum

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

**IN RE: All Telephone Companies Tariff Filings Regarding Reclassification of
Pay Telephone Service as Required by FCC Docket 96-128.**

DOCKET NO. 97-00409

UTSE MOTION FOR EXTENSION OF TIME

United Telephone-Southeast, Inc. ("United" or "Company") hereby requests the Tennessee Regulatory Authority for an extension of time to January 11, 2002 in which to file a response to the Motion to Compel filed by the Tennessee Payphone Owner's Association ("TPOA") on December 28, 2002. In support of this motion United shows as follows.

The TPOA served its Motion to Compel dated December 28, 2001 by faxing a copy thereof to counsel for United at approximately 4:00 P.M. on Friday December 28, after counsel for United had left the office. Counsel for United returned to the office Wednesday, January 2, 2002 and discovered the motion to compel.

The TRA procedural rules require oppositions to preliminary motions such as motions to compel to be made within seven days of service (Section 1220-1-2-.06(2)). Absent an extension of time in this case, United would be required to file its opposition by Friday, January 4, 2002 which is tomorrow. United anticipates that it will oppose portions of the Motion to Compel; however additional time to

review what United has provided in prior responses to discovery is necessary to ensure that its response will be correct.

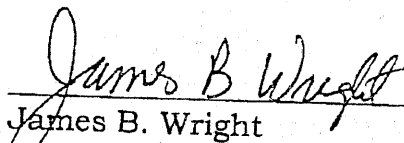
In view of the very brief time remaining in which to file its response, United asks that it be granted an extension of time to January 11, 2002 in which to respond. Counsel for the TPOA has stated he has no objection to United's Motion.

Wherefore United asks that its Motion be granted.

Respectfully submitted,

UNITED TELEPHONE-SOUTHEAST, INC.

Dated: January 3, 2002


James B. Wright
Senior Attorney
14111 Capital Boulevard
Wake Forest, North Carolina 27587

CERTIFICATE OF SERVICE; DOCKET 97-00409
(Pay Telephone Service Reclassification)

The undersigned hereby certifies that a copy of the foregoing Motion was served upon the following parties of record by fax or by depositing a copy thereof in the U.S mail addressed as follows:

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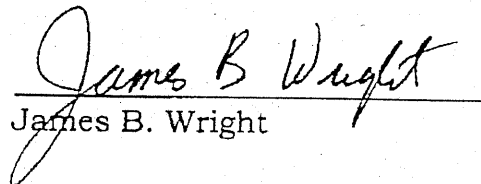
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January 3, 2002


James B. Wright

FACSIMILE TRANSMISSION

SPRINT

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LEGAL DEPARTMENT

DATE:

Jan. 3, 2002

TO:

David Waddell

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Susan Medlin

OPERATOR NO.

919-554-7236

Number of pages including this page:

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COMMENTS:

Please see attached Motion
for extension of time.

Jim Wright

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